

EXHIBIT 41

Sent: 4/19/2021 9:33:03 PM
To: Brown, Timothy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a1bcd95116e84d6692dd89f9d55c5b7a-Brown, Timo]
CC: Anderson, Andrea (SWI) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c5533c68a96e4697a16fb2757f2a084b-Anderson, A]
Subject: Policy Audit against NIST 800-53
Attachments: SolarWinds Policy Documentation Audit Report_4.12.2021.docx

Good afternoon Tim,
Andrea performed an audit against the NIST800-53 and generated a findings report for your review.
Please let us know if you have any questions and/or would like any additional information.
Thank you,
Kellie



Kellie Pierce | Security, Privacy & Compliance Director | **SolarWinds**
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SolarWinds Enterprise Policy and Procedures Documentation Audit – Executive Summary DRAFT

Date: 4/12/2021

Audit Objective:

The objective of this audit was to review the current SolarWinds security related policies included in the Enterprise Compliance Initiatives: "Enterprise Policy and Guidelines" library, identify the controls described within these documents and compare them to the controls identified in the National Institute of Standards and Technology (NIST) 800-53 Security framework.

In addition, this review was conducted to update, consolidate and inventory policies to prepare them for annual policy reviews.

Scope:

All policy documentation listed within the SharePoint "Enterprise Policies and Guidelines" library, including documented IT and Security related policies, guidelines, standards and procedures. The review also included, some of the Legal and HR published policy documentation, such as Code of Conduct, Employee Handbook, Data Retention Guideline and Export Compliance, etc. documents.

Methodology:

Prepared an inventory spreadsheet with current versions of policy documents listed in "Enterprise Policies and Guidelines" SharePoint library. This inventory listing includes document name, file location, link to document, current version#, date, prior version date, author, approver/owner name.

Utilizing the recommended controls from NIST 800-53 framework, mapped the SolarWinds controls identified in the policy documentation, to the 343 recommended baseline controls for high impact systems in NIST. Identified specific SWI Policy/Guideline/Procedures with sections where control requirement is described.

The audit was limited to the review of policy documentation available in the "Enterprise Policies and Guidelines" SharePoint library, and did not include any interviews with system owners, administrators or custodians, nor included any review of local handbook or procedure documentation that may further describe controls within a process or system.

Summary Conclusion:

Overall, about 40% of the baseline controls within NIST were met or partially met within the policies reviewed.

As of the date of testing, SolarWinds is still in the process of updating the policies and procedures and designing and implementing many of the NIST 800-53 recommended controls. Certain important elements of an effective Information Security Policy program are present such as:

- Updated Enterprise Security and Access Guideline



- Security Statement
- Robust Incident Response Plan

The following chart represents further breakdown of the NIST controls and where improvements are needed.

	NIST 800-53 Control Family	Total Controls	% of controls Met
1	Access Control (AC)	43	63%
2	Awareness & Training (AT)	5	80%
3	Audit & Accountability (AU)	28	50%
4	Security Assessment and Authorization policies (CA)	12	50%
5	Configuration Management (CM)	31	6%
6	Contingency Planning (CP)	35	6%
7	Identification and Authentication (IA)	24	46%
8	Incident Response (IR)	16	56%
9	Maintenance (MA)	13	8%
10	Media Protection (MP)	12	42%
11	Physical and Environmental Protection (PE)	26	50%
12	Planning (PL)	6	100%
13	Personnel Security Policy and Procedures (PS)	9	56%
14	Risk Assessment (RA)	8	38%
15	System and Services Acquisition (SA)	19	26%
16	System and Communications Protection (SC)	35	26%
17	System and Information Integrity (SI)	21	67%
	Total	343	40%

Policy Documentation Improvements in progress

As of the date of this review, the following Policies, Guidelines and Standards Operating procedures are drafted, and in the process of review, approval and/or distribution:

- Patch Management Policy – approved, ready for distribution
- Vulnerability Disclosure Policy – approved, ready for distribution
- Logging and Monitoring Policy DRAFT – in review
- Enterprise IT Policy Governance DRAFT – in review
- Patching CorpIT Standards Operating Procedure (SOP) DRAFT
- Mobil Device Management (MDM) Policy with BYOD Guidelines DRAFT
- Cryptographic Controls Policy DRAFT
- Change Management Policy DRAFT

